

UNITED STATES DISTRICT COURT
for the
Southern District of Ohio

United States of America)
v.)
MICHAEL DOUGLAS BOEH) Case No. 1:25-mj-157
)
)
)
)

)
Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 19 to 25, 2024 in the county of Hamilton in the
Southern District of Ohio, the defendant(s) violated:

| <i>Code Section</i> | <i>Offense Description</i> |
|-----------------------------------|--|
| 21 U.S.C. § 841(a)(1) & (b)(1)(C) | Possession with Intent to Distribute Cocaine |

This criminal complaint is based on these facts:

See Attached Affidavit

Continued on the attached sheet.



Complainant's signature

Daniel J. Merrell, USPIS TFO

Printed name and title

Sworn to before me and signed in my presence.

via FaceTime video

Date: Feb 24, 2025

City and state: _____ Cincinnati, Ohio _____


Karen L. Litkovitz
United States Magistrate Judge



**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO**

**AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT AND ARREST WARRANT**

The undersigned, Daniel J. Merrell, being first duly sworn deposes and states as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I submit this affidavit in support of a criminal complaint and arrest warrant, charging **MICHAEL DOUGLAS BOEH** with Possession with Intent to Distribute Cocaine, in violations of 21 U.S.C. § 841(a)(1) & (b)(1)(C).
2. I am a United States Postal Inspector Task Force Officer (TFO) with the United States Postal Inspection Service (USPIS), assigned to the Cincinnati, Ohio Field Office. I have been employed by the United States Postal Inspection Service since September 15, 2022. I have investigative responsibility for southwest Ohio and Northern Kentucky. Part of my investigative responsibility involves the use of the United States Mail in the illegal transporting of narcotics and other dangerous controlled substances and financial proceeds relating thereto.

3. I have gained experience from previous drug investigations, ongoing drug trafficking investigations, as well as information corroborated by confidential informants, other law enforcement officers, database records, and through surveillance. I am a sworn peace officer with the Kenton County Police Department and has been so employed for more than eleven years. I have received over 300 hours of formal classroom training specifically in the area of drug investigations, to include Drug Enforcement Administration (DEA) Basic Narcotics Investigator School, Illicit Drug Investigations, Kentucky Drug Investigations, Undercover Operations, Drug Investigative Techniques, and several other relevant classes. I have also received the certificate of "Advanced Law Enforcement Officer" from the Kentucky Law Enforcement Council. I obtained my bachelor's degree in Criminal Justice through Liberty University. I am currently assigned to the Northern Kentucky Drug Strike Force (NKDSF) and the United States Postal Inspection Service (USPIS) with duties and responsibilities to investigate drug abuse and drug trafficking offenses. During my tenure, I have investigated, arrested, interviewed, and assisted in the conviction of numerous drug traffickers on both the State and Federal level. As a result, I have interviewed numerous individuals involved in drug trafficking. From these interviews, I have become familiar with the various methods used by drug traffickers to manufacture, conceal, package, transport and distribute their illegal product. I'm aware of the various means used by drug traffickers and drug trafficking organizations (DTOs) to import and distribute their product, launder their monies, and evade detection by law

enforcement. Through these experiences I have learned that distributors of illegal drugs employ various methods to avoid detection and thwart efforts by law enforcement including the use of cellular telephone technology, counter and anti-surveillance techniques, elaborately planned smuggling schemes tied to legitimate businesses, false or fictitious identities, straw ownership, and coded communications and conversations. I have also learned that drug traffickers commonly possess firearms to protect their product and proceeds derived from the illegal sales. These investigations have included the use of a variety of investigative techniques and resources, including physical and electronic surveillance, the analysis of telephone records or other forms of communication, and the use of various types of informants and cooperating sources. I have also assisted in undercover operations, have authored and executed various arrest warrants as well as search warrants of residences and businesses.

4. I am familiar with the facts and circumstances of this case. The information contained in this affidavit is either personally known to me, based upon surveillance, my interview of various witnesses and review of various records/tracking data and publicly available information, or has been relayed to me by other agents or sworn law enforcement personnel. Because this affidavit is provided for the limited purpose of establishing probable cause to support a criminal complaint and arrest warrant, I have not included all details

and aspects known by this investigation, but rather, I have set forth only those facts that I believe are necessary to establish probable cause.

5. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to arrest and charge **MICHAEL DOUGLAS BOEH** with Possession with Intent to Distribute cocaine, in violations of 21 U.S.C. § 841(a)(1) & (b)(1)(C).

STATEMENT OF PROBABLE CAUSE

6. On or about November 22nd, 2024, U.S. Postal Inspectors identified and intercepted the Subject Package from the Cincinnati Processing and Distribution Center located within the Southern District of Ohio. The Package is further described as a Priority Mail Parcel: 9505 5154 5404 4325 9194 24, Weighing approximately 4 Pounds and 13.0 Ounces in a Large Flat Rate Box and addressed to 3323 Bassett Road in Cincinnati, Ohio. Postage paid was \$26.00.
7. I began an investigation of the Subject Package and found it was mailed from the San Bruno Post Office, San Bruno, CA. 94066, on November 20th, 2024. I searched the sender information through an investigative database available for law enforcement and found that the sender name “Scott Brown” was not associated with the sender address of the Subject Package. I searched these same databases for the listed addressee of the package and found that “Mary V Boeh” was associated with the address however she had been deceased as of June 22nd, 2024.

8. Based on all of the listed information I deployed my narcotics detection canine “Lisa”, who alerted positively to the presence or odor of a controlled substance upon the Subject Package.
9. On November 22nd, 2024, I sought and obtained a Federal Search Warrant for the package through Honorable Judge Peter B. Silvain, Jr. Inspector Roth and Rossiter executed the warrant and found it contained approximately 1,300 grams of cocaine. A presumptive test of the powder found it tested positive for cocaine.
10. On November 25th, 2024, I sought and obtained an anticipatory warrant and a GPS tracker warrant for the Subject Package through Honorable Judge Peter B. Silvain, Jr. USPIS sought the assistance of RENU to conduct the controlled delivery.
11. During the controlled delivery the package was accepted and taken into the residence of 3323 Bassett Road in Cincinnati, Ohio. RENU subsequently executed the warrant at which time a quantity of cocaine, marijuana, suspected pressed fentanyl/meth pills were recovered, a stolen firearm, a separate firearm, and approximately \$16,818.00 in US currency was recovered.
12. Two subjects related to the residence were detained this date with one of the subjects who’s initials are F.B. I advised F.B. of his Miranda Rights, and the following was stated pertinent to this investigation.
 - a. F.B. initially stated that this box (the Subject Package) was for a “white guy” from Price Hill but would later admit that the package was for his brother **MICHAEL BOEH**.

- b. F.B. stated that a few days prior he'd spoken with **MICHAEL BOEH** out front of 3323 Bassett Road about a package coming to the residence.
- c. **MICHAEL BOEH** told F.B. that a package was coming in and to just leave it on the porch.

13. On December 6th, 2024, USPIS National Guard Analyst Austin Ingram obtained video surveillance related to the mailer of the Subject Package. Inspector Welson Ho provided the video and a screenshot (see picture below) of the mailer of the Subject Package. I immediately identified the male as **MICHAEL BOEH** who had mailed the Subject Package.



14. Also on December 6th, 2024, USPIS TFO Mike Ritter sought assistance from Dylan P Destugues with HSI who issued subpoenas to multiple airline companies who fly out of CVG. A subpoena was returned that showed **MICHAEL BOEH** flew on Delta Airlines on November 19th, 2024, and returned November 21st, 2024, out of CVG to Frisco, California.

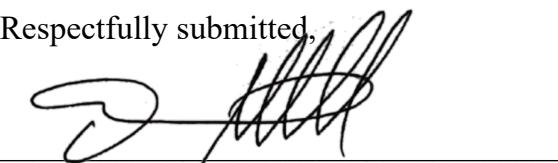
15. On December 13th, 2024, the cocaine seized from the Subject Package was accepted by the Drug Enforcement Administration (DEA) North Central Laboratory. On January 23rd, 2025, the examiner received and subsequently sent a Chemical Analysis Report which showed the substance identified was cocaine and it weighed 1003.2 grams.

16. From training and experience, I know that approximately 1 kilogram of cocaine is a quantity used for distribution purposes.

CONCLUSION

17. Based on the foregoing facts, your affiant has probable cause to arrest and charge **MICHAEL DOUGLAS BOEH** with Possession with Intent to distribute cocaine, in violations of 21 U.S.C. § 841(a)(1) & (b)(1)(C).

Respectfully submitted,



Daniel J. Merrell
Task Force Officer
United States Postal Inspection Service

Subscribed and sworn to before me on this 24th day of February 2025.


Karen L. Litkovitz
United States Magistrate Judge

